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In Re:

**JEAN L. THOMAS,**

Debtor

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Case No. 07-26749

Judge: Kathryn C. Ferguson

Chapter 13

**ATTORNEY CERTIFICATION IN  
OPPOSITION TO MOTION FOR ORDER  
DIRECTING PAYMENT OF FUNDS**

Returnable: July 8, 2015

**MARK GOLDMAN, ESQ.** hereby certifies that

1. I am the attorney representing the debtor in a current Chapter 13 bearing the case number 13-17611. The debtor's Chapter 13 plan was confirmed by this Court on July 19, 2013. The debtor's plan proposed to pay back to the City of Newark on a sewer lien the amount of \$900.00, real estate tax arrears in the amount of \$19,600 for property located at 168-170 Ridgewood Avenue, Newark, real estate tax arrears for 294 S. 19<sup>th</sup> Street, Newark in the amount of \$16,000 and another water and sewer lien in the amount of \$3,200. The City of Newark is being paid on these claims.

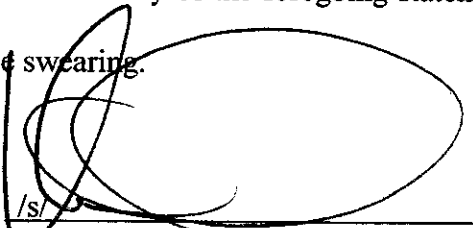
2. On or about May 18, 2015 the City of Newark through the law firm of Mester & Schwartz, PC, filed a motion seeking unclaimed funds from a prior Chapter 13 filed by the debtor bearing the case number of 07-26749. The City of Newark is

seeking \$3612.13 which was not paid to this creditor. Upon information and belief if this money is recovered by the City of Newark it would be receiving double payment since the debtor is providing for payments of all outstanding arrears to the City of Newark.

3. It is therefore respectfully requested of this Court that the City of Newark be compelled to credit the \$3,612 to the debtor's current Chapter 13, in order to avoid double payment to the City of Newark.

**I HEREBY CERTIFY** that the foregoing statements made by me are true to the best of my knowledge, information, and belief. I am aware that if any of the foregoing statements are willfully false, we are subject to punishment for false swearing.

DATED: 6/23/15

  
/s/ **MARK GOLDMAN, ESQ.**  
Attorney for the debtor